IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE Nashville Division

L.W., by and through her parents and next friends, Samantha Williams and Brian Williams, *et al.*,

Plaintiffs,

ν.

Civil No. 3:23-cv-00376

JONATHAN SKRMETTI, in his official capacity as the Tennessee Attorney General and Reporter, *et al.*,

Defendants..

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Rule 83.01(b) of the Local Rules of this Court, Stella Yarbrough, a member of the bar of this Court, hereby moves for the admission *pro hac vice* of Tara L. Borelli, an attorney at Lambda Legal Defense and Education Fund, Inc., 1 West Court Square, Ste. 105, Decatur, GA 30030, 404-897-1880, tborelli@lambdalegal.org, for the purposes of this litigation in this Court as counsel for plaintiffs.

- 1. Tara L. Borelli does not reside in this district and does not maintain an office in this district for the practice of law.
- 2. Tara L. Borelli is a member in good standing of the United States District Court for the Central District of California. A certificate of good standing and sworn statement regarding disciplinary, contempt, and criminal proceedings are attached, and the filing fee

in the amount of \$150.00 has been paid to the Clerk via the Court's electronic payment system.

Dated: April 21, 2023

Respectfully submitted,

/s/ Stella Yarbrough

Stella Yarbrough, BPR No. 033637 ACLU Foundation of Tennessee P.O. Box 120160 Nashville, TN 37212

Tel.: 615-320-7142 syarbrough@aclu-tn.org

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Plaintiffs,

ν.

and Reporter, et al.,

JONATHAN SKRMETTI, in his official capacity as the Tennessee Attorney General

Defendants.

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DECLARATION OF TARA L. BORELLI

- I hereby certify that I am a member in good standing of the bar of the United States District
 Court for the Central District of California. A true and correct copy of my Certificate of
 Good Standing is included with the motion for my admission *pro hac vice*.
- 2. I also declare under penalty of perjury that I am not, nor have I ever been, the subject of criminal proceedings nor disciplinary proceedings by any disciplinary authority, nor have I had a finding of contempt or a sanction against me under 28 U.S.C. § 1927.

<u>/s/ Tara L. Borelli</u>

Tara L. Borelli
California State Bar No. 216961
Lambda Legal Defense and Education Fund,
Inc.
1 West Court Square, Ste. 105

Decatur, GA 30030 Tel: (404) 897-1880 tborelli@lambdalegal.org

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on April 21, 2023, a true and correct copy of the foregoing has been served on all defendants via certified mail to the Tennessee Attorney General at the following address:

500 Dr MLK Jr Blvd Nashville, TN 37219

/s/ Stella Yarbrough

Stella Yarbrough BPR No. 033637 American Civil Liberties Union Foundation of Tennessee P.O. Box 120160 Nashville, TN 37212 Tel: (615) 320-7142 syarbrough@aclu-tn.org

Attorney for Plaintiffs